



U.S. Department of Justice

United States Attorney Eastern District of New York DEM

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February 24, 2006

VIA ELECTRONIC CASE FILING

Honorable Frederic Block United States District Judge United States Courthouse 225 Cadman Plaza East Brooklyn, New York 11201 THE Application Fuz An extension with 3/24/06

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Re:

Carolyn L. Copeland v. Jo Anne B. Barnhart,

Civil Action No. CV-05-3684 (Block, J)

00/52/5 (acc)

Dear Judge Block:

We write concerning the above-captioned civil action, in which Plaintiff seeks review of the Commissioner of Social Security's denial of her application for disability benefits on the grounds that she was not disabled within the meaning of the Social Security Act. At the present time, Defendant respectfully requests an extension of her time to serve her motion for judgment on the pleadings, until March 24, 2006, for the reasons detailed below.

In the instant matter, Defendant timely filed her answer, along with a copy of the administrative record, on November 21, 2005. In light of the volume of the record, however, which comprises roughly six-hundred-and-fifty-two pages of medical records, transcripts, and administrative documents, Defendant would respectfully request that she be permitted until March 24, 2006, to prepare and serve her motion papers in this action, with a concomitant extension of the date for the service of Plaintiff's opposition to April 24, 2006, and with Defendant's reply, if any, to be served by May12, 2006, at which time the fully-briefed motion will be filed with the Court. No prior request for an adjournment of any deadline has been made by any party in this action.

We apologize for any inconvenience and delay resulting from this request, and thank the Court for its time and consideration in this matter.

Respectfully submitted,

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By:

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cc:

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